

Facility Name: **Exlabesa Extrusion Tifton, Inc.**
City: Tifton
County: Tift
AIRS #: 04-13-277-00012

Application #: TV-509409
Date Application Received: February 2, 2021
Permit No: 3354-277-0012-V-07-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Exlabesa Extrusion Tifton, Inc.

2. Parent/Holding Company Name

Tifton Aluminum Extrusions, Inc.

3. Previous and/or Other Name(s)

Tifton Extrusions, Inc.

Tifton Aluminum Company, Inc.

Tifton Aluminum Extrusions, Inc.

4. Facility Location

250 Southwell Blvd. Tifton, GA 31794

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in Tift County, an attainment area for all air pollutants.

B. Site Determination

There are no site determination issues associated with this facility. There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3354-277-0012-V-06-0	August 1, 2016	Title V Renewal
3354-277-0012-V-06-1	January 24, 2020	Administrative Permit Amendment (Name Change)

D. Process Description

1. SIC Codes(s)

3354 - Aluminum Extruded Products

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Aluminum logs are heated and extruded through steel dies into aluminum parts sold for use in the construction and building industry. Some of the extruded aluminum parts are painted in a large vertical paint booth prior to being sold.

3. Overall Facility Process Description

Aluminum logs/billets are heated in four billet heaters to increase malleability and are transferred to four aluminum presses where they are extruded to customer specifications and are sold for use in the construction and building industry. The extruded aluminum is then transferred to the Cutter systems (4) where they are sized as appropriate. The aluminum is then baked in the Age Ovens (5). After the aluminum has been set, it is either shipped out to customers or transferred to the paint booth system of the facility as necessary.

The paint booth systems begin with a washer and Flash-off Conveyors (2) which prepare the extruded aluminum for paint application. The Flash-off Conveyors transport the extruded aluminum to either the Vertical Paint Booth or the two Powder Coating Paint Booths depending on sizing and coating specifications. Aluminum painted in the Vertical Booth is then transferred to each booth's respective Paint Bake Oven where coatings are set. After coatings are set, the product is then ready to be shipped to customers.

The existing Horizontal Paint Booth (P431) no longer uses VOC/HAP containing liquid paints and only uses electrostatic powder coating paint processes with appropriately designed and operated particulate system which are conditionally exempt from permitting per GRAQC 391-3-1-.03(6)(h)(10). Therefore, this unit has been removed from Table 3.1 and references to Emission Unit No. P431 in the permit have been removed.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a true minor source with respect to PSD/NSR regulation. The major source threshold for PSD applicability is 250 tpy unless the source is included in a list of 28 specifically defined industrial source categories for which the PSD “major” source threshold is 100 tpy. None of the facility’s criteria pollutants has a potential emissions over 250 tpy.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility’s Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓		✓	
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

As shown in the above table, the facility is major under Title V for single and combined HAP.

3. MACT Standards

Since the facility is a major source for single/combined HAP, it is subject to 40 CFR 63 Subpart Mmmm “National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products.”

According to the narrative that explained Title V Permit No. 3354-277-0012-V-06-0, The facility is not subject to 40 CFR 63 Subpart RRR, “National Emission Standard for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production” because all equipment subject to 40 CFR 63 Subpart RRR has been removed from the facility.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	no
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility is operating in compliance with its Air Quality Permit.

D. Permit Conditions

None.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
P405	Paint Mix Room	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	N/A	N/A
P430	Vertical Paint Booth	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	--	Dry Filters
P435	Flash-Off Conveyor No. 1	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	N/A	N/A
P436	Flash-Off Conveyor No. 2	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	N/A	N/A
P440	Vertical Booth Bake Oven	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	N/A	N/A
P441	Paint Bake Oven	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	N/A	N/A

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

None applicable.

Rules and Regulations Assessment:

391-3-1-.02(2)(b) Visible Emissions:

All manufacturing processes, including the paint mix room, paint booth(s), flash-off conveyors, and bake ovens, are subject to the visible emission limit specified in GA Rule (b). For fuel burning sources such as flash-off conveyors and bake ovens, compliance is achieved with firing natural gas or propane only because natural gas and propane are a clean fuel. For paint booth(s), compliance is achieved with the use of dry filters. The operation nature of the other manufacturing processes are not expected to generate much PM emissions; therefore, compliance is also expected.

Rule 391-3-1-.02(2)(e) Particulate Emission from Manufacturing Processes

Georgia Rule (e) limits particulate emissions from manufacturing processes to below the following:

$E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

$E = 55 * P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

where: E = PM emission rate in lbs/hr

P = Process weight in tons per hour

It should be noted that the flash-off conveyors and bake ovens are not considered “Fuel Burning Equipment” per Georgia Rule 391-3-1-.01(cc) as these units do not provide process heat to the production process through a heat exchanger. Therefore, emissions from these units are subject to the requirements of Georgia Rule (e) rather than Georgia Rule (d). As such, this regulation is applicable to each process in the emission unit table in Section III.A. of this narrative. With the same reasoning specified in the GA Rule (b) analysis, compliance with the GA Rule (e) PM emission limits is expected.

Rule 391-3-1-.02(2)(g) Sulfur Dioxide

Georgia Rule (g) limits sulfur dioxide emissions from fuel burning sources by limiting the sulfur content of fuel to be 2.5% sulfur by weight. All fuel burning sources are subject to this regulation. Since all of them are required to fire natural gas and propane only, and both fuels contain minimal amount of sulfur, compliance with the GA Rule (g) fuel sulfur content is expected.

40 CFR 63 Subpart M National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Exlabesa Extrusions Tifton, Inc. is subject to 40 CFR 63 Subpart M as it paints miscellaneous metal parts and is a major HAP source. The facility utilizes several paints that are subject to restrictions in this subpart. This subpart limits the HAP content of coatings, solvents, and paints used on miscellaneous metal part to below 2.6 lb of HAP/gal of coating. As the facility uses coatings with a HAP content above 2.6 lb/gal, the facility has relied on the “Emission rate without add-on controls” compliance option as contained in 40 CFR 63.3891(b) into its VOC/HAP recordkeeping system and monitors the average HAP content of the coatings used at the facility on a monthly basis.

Note that the facility does not have any add-on control for VOC emissions. Therefore, all of the requirements associated with the compliance option of “Emission rate with add-on controls” are not included in the proposed Title V renewal permit.

Although the facility is less likely to choose the “Compliant Material Option,” all requirements associated with this option are still included in the proposed Title V renewal permit.

Notable Exemptions:

Rule 391-3-1-.02(2)(ii): VOC Emissions from Surface Coating of Miscellaneous Metal Parts

Georgia Rule (ii) sets performance standards for metal surface coating operations. While Exlabesa Extrusions Tifton, Inc. is a miscellaneous metal parts coating operation, potential VOC emissions from applicable operations (paint booths) are below 100 tpy (95.0 tpy VOC emissions limit). Per Rule 391-3-1-.02(2)(ii)13. and 10., the facility is not subject to Georgia Rule (ii).

C. Permit Conditions

Condition 3.2.1 specifies the fuel types for the flash-off conveyors and paint bake ovens. This subsumes the GA Rule (g) fuel sulfur content limit.

Condition 3.2.2 caps VOC emissions from miscellaneous metal coating processes (paint booths) below 95 tpy, in order to avoid being subject to GA Rule (ii).

Condition 3.3.1 subjects all major emission units to 40 CFR 63 Subpart A and Subpart MMMM.

Condition 3.3.2 includes the 40 CFR 63 Subpart MMMM HAP emission limits.

Condition 3.3.3 specifies the two compliant options for the facility. Note that the facility is not equipped with any add-on VOC controls, so the “Emission rate with add-on controls” option is not included in the permit.

Condition 3.3.4 specifies the predominately activity emission limit.

Condition 3.3.5 provides the option of “Facility-Specific Emission Limit” under 40 CFR 63.3890(c)(2).

Condition 3.4.1 includes the GA Rule (b) visible emission limit.

Condition 3.4.2 includes the GA Rule (e) PM emission standards.

Condition 3.5.1 requires the use of dry filters at all times during the operation of the paint booth.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires monitoring the pressure drop across the dry filters that controls PM emissions from the paint booth. This is to ensure proper operation of the dry filter and continuous control of PM emissions.

C. Compliance Assurance Monitoring (CAM)

The purpose of 40 CFR 64, Compliance Assurance Monitoring (CAM) is to provide a reasonable assurance of compliance with emission limitations and standards for the anticipated range of operations at a pollutant-specific emission unit (PSEU) [§64.3(a)]. Applicability of CAM determination for the emission source is as below:

- They are located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- They are subject to emission limitation or standard. [GA Rule (e) limit] for the applicable regulated air pollutant (PM). [§64.2(a)(1)]
- They use control device (dry filters) to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of applicable pollutant (PM) from the unit are at least 100 percent of major source threshold. [§64.2(a)(3)]
- They are not otherwise exempt. [§64.2(b)]

Below was discussed in the narrative that explained Title V Permit No. 3354-277-0012-V-06-0:

In accordance with CAM rules, PSEUs are units for which there exists an emission standard for which there is a Part 64 control device and where the pre-control potential emission rate is equal to or greater than 100 percent of the major source threshold. The calculations submitted by the facility with the Title V application indicate that the uncontrolled emissions from the paint booth is less than the major source threshold for PM₁₀ of 100 tpy. Therefore, CAM is not required for the dry filters.

As shown in the emission unit table, the facility does not have any controls other than the dry filters. Therefore, CAM is not required for any other pollutants.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7 contains the following exceedance and excursion definitions:

- Subparagraph b.i. defines an exceedance as any twelve consecutive months rolling total paint booth VOC emissions exceeds 95 tons.
- Subparagraph c.i. defines an excursion as any two consecutive daily pressure drop readings, as determined by Condition 5.2.1a., that is outside of the established operating range.
- Subparagraph d.i. requires notifications for any failure to comply with the 40 CFR 63 Subpart MMMM reporting and recordkeeping requirements specified in Conditions 6.2.7 through 6.2.16.

Condition 6.2.1 through 6.2.4 includes the methodology to track the actual monthly and 12-month rolling totals of VOC emissions from the paint booth(s). The record is used to verify compliance with the VOC emission limit of Condition 3.2.2.

Since the facility does not operate any VOC add-on controls, the requirements specified in existing Condition 6.2.5 are not needed and are not included in the proposed Title V permit.

Condition 6.2.5 now includes the semiannual compliance reporting requirements that were previously included in existing Condition 6.2.6. The source of such requirements are 40 CFR 63.3920(a), 63.3942(b) and (c), and 63.3952(b) and (c).

New Condition 6.2.6 requires that, in addition to the semiannual report submittal to GA EPD, the facility must upload the semiannual compliance report to the EPA via the CEDRI.

Condition 6.2.7 specifies what records must be maintained and how the records should be stored. These are required by 40 CFR 63.3930(a) and 63.3931(b) and (c).

Condition 6.2.8 contains the record keeping requirements specified in 40 CFR 63.3930(b).

Condition 6.2.9 contains the compliance option related record keeping requirements specified in 40 CFR 63.3930(c)(1).

Condition 6.2.10 includes an equation for the “Compliance Material Option” demonstration. This is included in 40 CFR 63.3930(c)(2).

Condition 6.2.11 includes the record keeping requirements specified in 40 CFR 63.3930(c)(3); 40 CFR 63.3951(c).

Condition 6.2.12 includes the record keeping requirements specified in 40 CFR 63.3930(d); 63.3951(d).

Condition 6.2.13 includes the record keeping requirements specified in 40 CFR 63.3930(e).

Condition 6.2.14 includes the record keeping requirements specified in 40 CFR 63.3930(f).

Condition 6.2.15 includes the record keeping requirements specified in 40 CFR 63.3930(g) and 40 CFR 63.3951(c) and (d).

Condition 6.2.16 includes the record keeping requirements specified in 40 CFR 63.3930(h).

Condition 6.2.17 includes the record keeping requirements specified in 40 CFR 63.3930(j).

VII. Specific Requirements**A. Operational Flexibility**

Not applicable.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

See Permit Application on GEOS website and Attachment B of the permit

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility has indicated in the application that they do not have air conditioners or refrigeration equipment that use CFC's, HFC's, or other stratospheric ozone-depleting substances.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//